

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No.: 23-60118-CR-RUIZ**

**UNITED STATES OF AMERICA,**

**v.**

**BLAKE KELLY,**

**Defendant.**

/

**MOTION FOR REDUCTION OF SENTENCE**

Pursuant to United States Sentencing Guideline Section 5K1.1, the United States of America hereby moves for a reduction of the sentence of Defendant Blake Kelly based on his substantial assistance in the prosecution of others.

The Defendant's sentencing in this case is currently set for March 13, 2024. The Defendant has provided substantial assistance to the Government in the prosecution of others, namely the guilty plea of his co-defendant. The Government will indicate the nature and quality of the Defendant's cooperation at the Defendant's sentencing hearing or, should the Court request, by other means.

Based on the Defendant's cooperation, the Government respectfully requests that the Defendant's sentence be reduced by twenty-five percent of the bottom of the Court-ordered guidelines range.

Counsel for the Defendant Kelly agrees with the relief sought but not in the amount of the proposed reduction.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: /s/ Roger Cruz  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Roger Cruz  
Roger Cruz  
Assistant United States Attorney